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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH; *et al.*

Plaintiffs,

vs.

RYAN CARROLL; *et al.*

Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**STIPULATION BETWEEN
PLAINTIFFS AND DEFENDANT
MATTHEW CROUCH
REGARDING RESPONSE
DEADLINE TO SECOND
AMENDED COMPLAINT, ECF.
NO. 173**

Presiding Judge: Hon. Wesley L. Hsu
Trial Date: N/A

1 Pursuant to Local Rule 7-1, plaintiffs David Hough, et al. (“Plaintiffs”) and
2 defendant Matthew Crouch (“Crouch”) hereby stipulate as follows.

3 1. Plaintiffs filed their initial complaint in this Court on April 9, 2024.
4 ECF No. 1. They filed a first amended complaint (“FAC”) on May 20, 2024. ECF
5 No. 56. The FAC named Crouch as a defendant for the first time.

6 2. On July 3, 2024, the Court approved a stipulation between Plaintiffs
7 and Crouch in which Crouch waived service of a summons in this action and Crouch
8 was given until September 30, 2024, to respond to the FAC.

9 3. On September 11, 2024, after Plaintiffs indicated that they intended to
10 file a Second Amended Complaint (“SAC”), Plaintiffs and Crouch stipulated,
11 subject to the Court’s approval, to stay Crouch’s time to file a responsive pleading
12 until 30 days from the date Plaintiffs filed their then-anticipated SAC, ECF No. 136.
13 On September 26, 2024, the Court approved the Stipulation and set Crouch’s
14 deadline to respond to the anticipated SAC for 30 days after the date of the SAC’s
15 filing. ECF. No. 139.

16 4. On November 27, 2024, this Court granted Plaintiffs’ motion for leave
17 to file the SAC. ECF No. 167.

18 5. On December 20, 2024, Plaintiffs and Crouch stipulated, subject to the
19 Court’s approval, to stay Crouch’s time to file a responsive pleading until January
20 17, 2025. ECF No. 192. On January 13, 2024, the Court approved the Stipulation
21 and set Crouch’s deadline to respond to the SAC for January 17, 2025. ECF. No.
22 221.

23 6. Plaintiffs and Crouch are in advance discussions of a prospective
24 agreement that, once agreed to, would result in Plaintiffs voluntarily dismissing
25 Crouch from this action. Nearly all material terms of the agreement have been
26 agreed to.

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7. Plaintiffs and Crouch anticipate that (i) the agreement will be finalized in the coming days and (ii) Plaintiffs will voluntarily dismiss Crouch from this action on or before January 31, 2025.

8. To allow time to for Plaintiffs and Crouch to finalize the agreement and for Plaintiffs to thereafter voluntarily dismiss Crouch from this action, Plaintiffs and Crouch have agreed that Crouch's deadline to respond to the SAC should be extended by three weeks, until February 7, 2025.

Pursuant to L.R. 7-1 and 52-4.1, a separate proposed order to this effect is included herewith.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED: January 16, 2025

SOLOMON WARD SEIDENWURM &
SMITH, LLP

By: /s/ Levi Y. Silver

LEVI Y. SILVER

**Attorneys for Defendant
Matthew Crouch**

DATED: January 16, 2025

BANKS LAW OFFICE

By: /s/ Nico Bank

Nico Bank (CA SBN: 344705)

Attorneys for Plaintiffs

ATTESTATION

Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Levi Y. Silver

Levi Y. Silver